

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ST. PAUL MERCURY INSURANCE  
COMPANY

Plaintiff

v.

PHILADELPHIA HOUSING  
AUTHORITY

Defendant.

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Civil Action No. 02-CV-3511

**PLAINTIFF ST. PAUL MERCURY INSURANCE COMPANY'S  
MOTION TO PRECLUDE TESTIMONY OF CERTAIN WITNESSES**

Plaintiff St. Paul Mercury Insurance Company ("St. Paul"), by its undersigned counsel, hereby requests that the Court preclude the testimony of three witnesses identified in the Pretrial Memorandum of Defendant Philadelphia Housing Authority ("PHA"): James Conlin, Vince Mancini, and George Gomez. The ground for this motion, as set forth in detail in the memorandum in support of this motion, is that PHA failed to disclose these three alleged "witnesses" during discovery.

Respectfully submitted,

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Dated: 7/30/03

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